

Case in Germanic

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1 Introduction

The Germanic (henceforth Gmc) languages provide an extremely interesting backdrop for a discussion of case phenomena, shedding light on the interactions between morphology, syntax and semantics, as well as a number of diachronic issues. Indeed, Gmc languages have played a central role in the development of theoretical treatments of case, especially within the (broadly) generative tradition. The oldest attested members of the family, and in particular what we can reconstruct as Proto-Germanic (henceforth PGmc), were highly inflecting languages with rich systems of morphological case. Within their recorded histories, however, all of the Gmc languages have reduced the extent to which cases are distinguished morphologically, though with significant differences in the details of how much has been lost and when. This has led to a contemporary situation where some members of the family (especially Icelandic) have retained most of the older distinctions, others (e.g. German) have retained the basic category distinctions but heavily restricted the ways in which they are expressed, and still others (English, Dutch, Afrikaans, and most of the mainland Scandinavian varieties) have reduced morphological case to a few vestiges in the pronominal system. This means that any treatment of case in Gmc must be comparative and historical, but also that the family can provide interesting opportunities for developing and testing theories of how the properties of morphological case systems might interact with other characteristics of a language.

In any theoretically-minded discussion of case, it is of course important to clarify what precisely is intended by the term. There are well-established traditions for using case to refer to several distinct morphological, syntactic and semantic concepts relating to nouns and NPs, often in some combination with each other. For example in the Case Grammar tradition following [Fillmore \(1968\)](#), it refers essentially to the semantic or thematic role played by an NP, while within generative grammar in the Principles and Parameters tradition since the late 1970s, there is a notion of abstract syntactic Case, roughly an idealized abstraction of traditional morphological case categories spliced with a version of traditional grammatical functions as redefined in purely structural terms. Such theory-specific semantic and syntactic notions of case will not be my focus here, though they will frequently come up in the discussion. Rather, when I use the term ‘case’ without qualification, what I mean is essentially the traditional morphologically grounded understanding. This has the advantage of being rather

more theory-neutral, which allows me to delineate the subject matter in a relatively uncontroversial way and provides a simple basis for setting up comparisons.

Typologically speaking, the Gmc languages, both historical and contemporary, uniformly show nominative-accusative patterns of case marking, apparently inherited from Proto-Indo-European (henceforth PIE), with no hints of ergative-absolutive or any other case systems. Case markers in Gmc generally take the form of inflectional suffixes, usually fusional markers also indicating number, information about inflectional class and (indirectly) gender, sometimes complemented by semi-regular mutations of the stem to which they are applied (i.e. Umlaut). In the pronouns and demonstratives, case marking often involves a mixture of suffixation and stem suppletion. The morphological details of case inflection can thus be quite complex, especially in the older and more conservative languages. For relevant details, see Nübling (this volume).

The remainder of this chapter is organized as follows. In Section 2, I will discuss the different case inventories found in the various Gmc languages, starting with the six-case inventory that can be reconstructed for PGmc and working my way down to the successively smaller inventories and ultimately the (near) loss of case in some of the modern languages. This will include the necessary presentation of the relevant morphological details and basic discussion of the diachronic developments that lead from one inventory to another. Section 3 will be concerned with the distribution of the different cases in each language across grammatical environments, i.e. how the various cases are ‘assigned’. Of central importance here will be questions of how the distribution of the cases is determined by and related to details of the syntactic structure, the lexical identity of verbs and other predicates, and semantic issues. Then in Section 4 I will turn to a number of interesting empirical and theoretical questions about how case interacts with other grammatical phenomena in the Gmc languages. The issues here arise in any language with case marking, but the patterns observed in the Gmc languages have played an outsized role in theoretical discussions of case. Picking up from the discussion of how the cases are distributed, we will turn to the long-standing question of how case interacts with grammatical functions and in particular the existence of oblique subjects and the notion of quirky case. This will lead into a more general discussion of how morphological case interacts with syntax, including ideas of abstract Case and how richness of morphological marking may influence other syntactic properties of a language.

2 Inventories

PGmc, as best we can reconstruct it, had at least 6 morphologically distinct cases.¹ We can exemplify these with singular forms of the word for ‘day’ (a masculine *a*-stem) and ‘deed’ (a feminine *i*-stem), following the reconstruction of Ringe (2006).² Morpho-

¹It is also plausible that a distinct locative had not yet fallen together with the dative and/or the instrumental, but the evidence is equivocal at best. See Ringe (2006), Ringe and Taylor (2014, especially p. 379) and Harðarson (2017) for discussion.

²As is standard in historical linguistics, the asterisk preceding a form here indicates that it is reconstructed. PGmc was spoken by a pre-literate society, thus everything we know about the language has

	‘day’	‘deed’
Nominative	*dagaz	*dēdiz
Vocative	*dag	*dēdi
Accusative	*daga	*dēdī
Genitive	*dagas	*dēdīz
Dative	*dagai	*dēdī
Instrumental	*dagō	*dēdī

Table 1: PGmc ‘day’ and ‘deed’

logical case distinctions were clearly marked in PGmc on nouns, adjectives, pronouns, demonstratives and numerals up to four, though the details in *how* they were marked in these categories differ considerably. Already in PIE, the pronouns in general had their own special inflection which differed in several points from the nominal inflection, including not just distinct sets of case endings but also rampant suppletion and other irregular stem alternations. As for the adjectives, in PIE their inflection had been essentially identical to that of nouns, but in the prehistory of PGmc, it underwent significant modifications. First, every adjective gained the ability to alternate between two distinct inflectional classes — the so-called ‘strong’ and ‘weak’ inflections — with the choice being sensitive to the definiteness of the NP. Second, the strong adjective forms began to diverge considerably from the originally identical strong noun forms by taking over distinctly pronominal case and number endings (see [McFadden, 2003 \[2009\]](#); [Ringe, 2006](#); [Ratkus, 2015](#)). This is relevant for our concerns primarily in that the innovative case-number endings of the strong inflection were morphophonologically more substantial than the original nominal ones (compare e.g. masculine singular accusative strong adjective **-anō* to nominal **-q*). They were thus more resistant to loss, so that in many Gmc languages certain case distinctions have held on longer in adjectives than in nouns. See Nübling (this volume) for more details.

Even though the PGmc case system was robust, a non-trivial number of syncretisms can already be observed. For example, dative and instrumental are syncretic in the inflection of ‘deed’, and nominative and accusative are systematically syncretic in neuters throughout the language. Furthermore, the case system of PGmc was already a reduction compared with PIE, which had distinguished at least 8 cases including an ablative and a locative. A gradual reduction in the number of distinct case categories is characteristic of the further development of Gmc, and in fact none of the actually attested languages distinguishes all six cases. Many of the older languages distinguish five, but differ in which one they have lost. There are four cases which all retain — nominative, accusative, genitive and dative — and which remain as a relatively stable core for a considerable amount of time. Gothic has lost the instrumental, having assimilated it to the dative, but preserves the vocative quite clearly. The West Gmc languages have all lost the vocative by the time of their earliest attestations, but maintain distinct instrumental forms, at least in certain masculine and neuter paradigms. The situation in North Gmc is a bit more complicated. The earliest stage attested in the early Runic inscriptions is quite fragmentary, and there is disagreement over whether

been reconstructed on the basis of evidence from its attested daughter languages.

certain forms should be interpreted as vocatives or not (Nielsen, 1998). By the time of the rather well-attested Old Icelandic (OIce), the vocative is gone. The instrumental is also no longer distinguished from the dative but has left behind clear traces, e.g. in the shape of certain neuter dative forms and in a number of otherwise surprising uses of the dative in modern Icelandic.³

The older languages also maintain case-inflectional distinctions on all of the categories where these were marked in PGmc. However, the overall frequency with which the full number of case distinctions available in a language as a whole are in fact expressed by particular forms is already significantly reduced compared to the Proto-language. Take e.g. the Old English (OE) forms in Table 2, descended from the PGmc ones in Table 1. The vocative has disappeared entirely from the language, and the in-

	'day'	'deed'
Nominative	dæg	dǣd
Accusative	dæg	dǣd
Genitive	dæges	dǣde
Dative	dæge	dǣde

Table 2: OE 'day' and 'deed'

strumental is no longer distinguished in the nouns. Furthermore, nominative and accusative, while distinguished with some nouns, have become syncretic for these two, and genitive and dative have fallen together for 'deed'. Indeed, while the four cases are still distinguished by noun inflection as whole, there is no individual noun in the language that distinguishes all of them. More distinctions are found in the OE adjectives, at least in the strong inflection. In fact, the masculine singular has distinct forms for all five cases including the instrumental. However, even here fewer distinctions are made in the the other genders and the plural, and the weak adjective declension has undergone quite massive syncretism. The case system is most extensively preserved in the pronouns, and especially in the demonstratives, exemplified in Table 3, though even here clear reductions relative to the Proto-language can be discerned. OE

	Sg			Pl
	M	N	F	
N	sē	þæt	sēo	þā
A	þone	þæt	þā	þā
G		þæs	þære	þāra
D		þæm	þære	þæm
I		þȳ/þon	þære	þæm

Table 3: OE simple demonstrative/definite article

can stand in reasonably well as a model for most of the older Gmc languages. The details of where exactly clear distinctions are to be found differ quite widely across the languages, but the overall patterns are remarkably similar.

³See Barðdal, 2001; Svenonius, 2002; Thráinsson, 2007 for some relevant discussion of 'instrumental' uses of the dative in Modern Icelandic.

Significant divergences among the languages first appear later in the Middle Ages. Though the timing for the various stages of the development, a similar diachronic pattern can be discerned across all of the languages (with the possible exception of Icelandic) — a gradual but persistent weakening and ultimately reduction of case distinctions. Initially, this amounts to an increase in the incidence of syncretism on individual word forms, with retention of the distinctions in a language as a whole. This development typically hits the nouns earliest and hardest, then the adjectives, and only in the last stages the pronouns and demonstratives, with the result that, during intermediate periods, the case of an NP as a whole will often still be clearly identifiable by summing up the various bits of information contributed by its different parts. As an example, consider the NP *der besten Spieler* in Modern German. The form of the definite article *der* could be masculine singular nominative, dative or genitive singular feminine, or genitive plural; *besten* ‘best’ in this context could be anything but nominative singular of any gender or accusative singular neuter; the noun *Spieler* ‘player’ is itself masculine, and its form could be anything but a genitive singular or dative plural. Each of these three word forms is thus multiply ambiguous for case, but the three together as one NP can only be genitive plural (‘of the best players’). In the more advanced stages of this development, as distinctions disappear even in pronouns and demonstratives, the case categories as a whole begin to collapse, and the system is reduced from four to three and then two cases, and in some of the languages arguably to a complete loss of morphological case.

Let us consider some specific examples of these stages of development. Standard German presents a straightforward example of the first intermediate stage. The four central cases are still distinguished, but the categories where distinctions are marked have been heavily reduced, and syncretism has increased significantly. Very few distinctions are now marked on nouns themselves, as seen in Table 4. Distinctions have

	‘day’		‘cow’	
	Sg	Pl	Sg	Pl
Nominative	Tag	Tage	Kuh	Kühe
Accusative	Tag	Tage	Kuh	Kühe
Genitive	Tages	Tage	Kuh	Kühe
Dative	Tag	Tagen	Kuh	Kühen

Table 4: German ‘day’ and ‘cow’

also been mostly lost in the numerals beyond ‘one’ and reduced to the bare minimum in the weak adjective inflection. Case marking is, however, alive and well in the pronouns, the strong adjectives and especially the demonstratives. Even in these categories, however, far fewer than the full set of potential distinctions are actually made. The nominative/accusative distinction is especially tenuous, restricted entirely to the masculine singular and the personal pronouns. This situation, where the four-case system is preserved, but only barely, is characteristic of historical stages of several of the other Gmc languages, including late OE/early Middle English (ME), Middle Dutch and late Medieval forms of the mainland Scandinavian languages.

The next stage can be exemplified with Yiddish, many modern German dialects, transitory stages of ME and many Scandinavian varieties. This is when one of the four

core cases ceases to be a productive part of the grammar, yielding a three-case system. In most of the languages it seems to have been the genitive which was lost first. In Yiddish, for example, similar patterns to those found in the closely related German are found in the pronouns, strong adjectives and demonstratives, but only for these three cases, and only a very small class of nouns still make any distinctions at all (Jacobs, 2005). Faroese also seems to be moving in this direction, as the use of its genitive is increasingly restricted (Thráinsson et al., 2004). It should be noted here that there are some complications regarding the status of the genitive in several of the modern languages, including English, Mainland Scandinavian, Yiddish, and colloquial German as well as many of its dialects. Forms that are in some sense the descendants of older clear genitives persist in these languages, but demonstrate peculiar behaviors suggesting that they should no longer be analyzed as true case marking. For example, English has generalized the suffix *'s* — historically the genitive singular of a large and productive class of masculines and neuters — to be a general possessive marker with nouns of all kinds. However, it is clearly no longer a nominal case suffix, but rather a phrasal affix or clitic on the entire nominal phrase, as shown by (1):

- (1) I really like [the woman over there]'s theory.

In colloquial German, an *-s* suffix has similarly spread from masculines and neuters to appear on feminines as well, but is largely restricted to names and name-like nominals and shows distinct syntactic behavior from the uncontroversial genitives of the modern standard language.⁴ This suggests that in these languages, the relevant suffixes no longer signal a general genitive case, but rather specific possessive structures.

The next distinction to be lost is that between accusative and dative. In English this occurred over the course of approximately two hundred years in the ME period, with significant differences between dialects, as chronicled in great detail by Allen (1995). In Mainland Scandinavian it happened significantly later, in most dialects by 1500 or 1600, though distinctly dative forms are retained even now in a significant number of varieties of Swedish and especially Norwegian (see Eyþórsson et al., 2013 and references there). In a number of German dialects we can observe this change in progress. Merkle (1993), e.g., describes details of the collapse of some dative and accusative forms in Bavarian. Yager et al. (2015) explore interesting developments in Heritage German varieties, where the dative is not so much being lost as being repurposed in a way reminiscent of differential object marking. Note that the form retained as the collapsed oblique of a given word in a given language is sometimes what was historically the accusative and sometimes what was the dative. In English, e.g., oblique forms for animates like *him* and *her* generally go back to old datives, whereas those for inanimates like *it* and *what* reflect old accusatives.

The reduction to a two-case system, where a nominative is distinguished from a general oblique, has generally been accompanied in the Gmc languages by a radical reduction in the categories where case distinctions are expressed. Thus the Mainland Scandinavian languages, English, Dutch and Afrikaans have all completely eliminated case-marking in nouns, adjectives, articles and numerals. The only place where nominative and oblique are distinguished is in the pronouns, and even here this has gener-

⁴Yiddish shows a pattern — what Jacobs (2005) refers to as the possessive — that is similar in its abstract outlines, but a bit more complex in the morphological details.

ally been restricted to the personal pronouns, relative pronouns, demonstratives and *wh*-pronouns having become indeclinable. Such heavily reduced patterns are sometimes referred to by the term **vestigial case** or **impoverished case**. Logically speaking, an even further reduction is of course possible, where the nominative-oblique distinction is given up, and a language simply ceases to have morphological case. Now, all Gmc language that I am aware of continue to have distinct forms of at least some pronouns that historically reflect case distinctions.⁵ However, in some of the vestigial case languages, including at least English, Danish and some Norwegian varieties, it can be argued that the contrasts here no longer really involve case (see especially [Parrott, 2007, 2009](#)). The arguments are based on the distribution of the different forms, thus I postpone discussion to Section 3.

Our understanding of the causes for this pattern of gradual loss of case distinctions remains surprisingly incomplete. The traditional and perhaps still most popular idea is that it was driven primarily by regular phonological developments which predictably obliterated most of the case distinctions via reductions of the unstressed final syllables that contained the various endings (see [Trask, 1996](#); [Blake, 2001](#); [Delsing, 2002](#), for representative presentations). However, while it is uncontroversial that certain case markers would have disappeared due to the operation of well established sound laws, phonological change cannot explain the loss of case distinctions on its own. There are several distinctions in the individual languages that should have remained intact after all known regular sound changes, yet were lost anyway. E.g., as discussed above, the genitive has been lost as a productive case in many German dialects, but there are no sound changes operating in these dialects that would have deleted the final *-s* characteristic of masculine and neuter genitive markers in the language. The fact that the genitive is so clearly on the retreat must, thus, have a non-phonological explanation. Figuring out what such non-phonological causes there might have been for the gradual dismantling of case distinctions in the Gmc languages turns out to be rather difficult. [Barðdal \(2009\)](#) and [Enger \(2013\)](#) offer extensive and convincing critiques of traditional proposals, especially the purely phonological ones, though their own alternative proposals remain largely suggestive. What exactly has driven the consistent reduction of the case systems of the Gmc languages must thus still be regarded as an open question.

3 Distributions

Let us now consider how the various cases discussed above are employed in the Gmc languages. I cannot hope to cover the distinct details of all of the historical stages of the various languages, and so I will focus here on a few representative snapshots. Let us start with a brief, pre-theoretical description of what the 6 cases must have been used for in PGmc. Since PGmc is prehistoric, and we care here about abstract patterns rather than specific forms, I will use English examples, annotated with the cases that would be expected. The nominative was the unmarked case for subjects in prototypical finite clauses, and for nominals predicated of the subject (2). The vocative was

⁵I am setting aside here creole languages with English or some other Gmc language as a lexifier, some of which lack such distinctions.

used for direct address (3). The accusative was the unmarked case for direct objects and was used for certain adverbial relations, including those describing extent direction notions, sometimes accompanied by prepositions (4). The genitive was used to mark NPs occurring inside of other NPs, including possessors and complements of nouns, as well as for certain adverbial relations (5). The dative prototypically marked experiencer, recipient and beneficiary objects, as well as various adverbial relations including locations, usually with local prepositions (6). The instrumental, as its name implies, was used to mark instruments and a range of other adverbial relations, often with prepositions (7).

- (2) This tree.NOM is an oak.NOM.
- (3) I.NOM am here, friend.VOC.
- (4) We.NOM baked bread.ACC all day.ACC.
- (5) Robin's.GEN child.NOM watched the baking.ACC of the bread.GEN.
- (6) Joe.NOM baked Hannah.DAT bread.ACC in the oven.DAT.
- (7) We.NOM sliced the bread.ACC with a sharp knife.INST.

This description covers only the broadest outlines, and the actual details will have been far more interesting. In particular, many subjects would have been accusative, dative or genitive, and objects could similarly be nominative, dative or genitive rather than accusative, with the choice depending on a combination of thematic and lexical issues. Let us move then to the actually attested languages, where these details can be explored based on real data.

The discussion will be based primarily on Modern Icelandic and German as these have been (by far) the most extensively studied and can together be taken as representative in the broad strokes of what can be found across the family. Against this background, I will then discuss interesting points of variation and deviation from these patterns in specific languages. It is generally agreed that the determination of the case of an NP, both in Gmc and cross-linguistically, depends on the interaction of syntactic, semantic and lexical factors. A first cut can be made between argument NPs and adjunct/modifier ones. Case must carry a particularly heavy load with non-argument NPs, since their relationship to the rest of the clause cannot be divined on the basis of their relationship to a selecting predicate. In languages without rich case systems, they are typically introduced by adpositions that indicate the kind of modification they are involved in. In case-rich languages, including the older Gmc ones, such essentially semantic information can instead be supplied by the choice of case, e.g. with instrumental case signalling that the NP describes the means or instrument by which an event is carried out. In such instances the semantic aspect is clearly primary, thus we typically refer to case assigned in this way as **semantic case** (see e.g. [Nikanne, 1993](#); [McFadden, 2004](#), ch. 3).

Turning to arguments, certain initial generalizations can be stated either in terms of the place of the NP within the argument structure of the verb, or in terms of its grammatical function, without reference to semantic factors or the lexical identity of the verb. These generalizations have important exceptions, which depend on semantic or lexical information (or a far more subtle syntactic analysis), but the case of the majority of argument NPs is covered by these purely syntactic or structural factors,

which is thus usually referred to as **structural case**. There are several different ways in which the rules of structural case assignment can be stated, based on distinct theoretical conceptions of case assignment. Here I will try to abstract away from these differences and adopt a reasonably theory-neutral presentation of the basic patterns, coming back to the theoretical questions that are particularly interesting for Gmc later in this section and the next.⁶ As nominative-accusative systems, the Gmc languages have two generally agreed upon structural cases: the nominative and the accusative.⁷ The highest argument NP in each finite clause (what can be thought of as the subject or the thematically most prominent NP), receives the nominative. If there is an additional, lower argument NP (the object, lower in the thematic hierarchy), it receives the accusative. This means that the structural accusative case will only be assigned in clauses with at least two argument NPs, since the nominative takes precedence. Thus the sole argument of all kinds of intransitives, including passivized transitives, will receive nominative. Non-finite complement clauses introduce interesting complications. In contexts where they can have an overt subject, this often counts for case purposes as belonging to the matrix finite clause. The notional subject or highest argument of the non-finite clause then counts as being thematically lower than the highest argument of the matrix finite clause. Thus, in the German example in (8), the highest argument *wir* ‘we’ gets nominative, while the notional subject *dich* ‘you’ of the non-finite clause gets accusative, as does the embedded object *deinen Aufsatz* ‘your paper’.

- (8) Wir lassen [dich deinen Aufsatz überarbeiten].
 we.NOM let you.ACC your paper.ACC revise
 ‘We’re going to have you revise your paper.’

Another complication arises when a predicate takes two arguments that are necessarily equated, i.e. with copulas and verbs with meanings like ‘become’. In such instances, both argument NPs generally get nominative case.

An important property of structural cases, much discussed in the literature on Gmc, is their ability to alternate according to the argument structure of the clause in which they appear (see Alexiadou and Schäfer, this volume). Thus e.g. we see the accusative on the embedded subject *dich* in (8) alternating with the nominative *du* in (9), when the relevant clause appears is unembedded and finite. Similarly, the accusative object *deinen Aufsatz* in (8) and (9) becomes nominative *dein Aufsatz* under passivization in (10).

- (9) Du überarbeitest deinen Aufsatz.
 you.NOM revise your paper.ACC
 ‘You’re revising your paper.’

⁶Questions of substance include the extent to which grammatical functions must be assumed to play a role, whether structural case assignment targets specific structural positions, and whether it is assigned by verbs and other heads in the clausal structure, or rather on the basis of hierarchical relationships between NPs within a structural domain. See among many others Zaenen et al. (1985); Yip et al. (1987); Marantz (1991); Wunderlich (1997); Reuland (2000); Stiebels (2002); McFadden (2004); Sigurðsson (2006); Baker and Vinokurova (2010); Baker (2015); Levin and Preminger (2015); Baker and Bobaljik (to appear)

⁷Ergative-absolutive and other systems work differently, though the building blocks involved are arguably the same (see e.g. Stiebels, 2002; Baker, 2015).

- (10) Dein Aufsatz wird überarbeitet.
your paper.NOM becomes revised
'Your paper is being revised.'

This is precisely what we should expect given the description of structural nominative and accusative above. Accusative is only assigned to an NP that is thematically and structurally lower than some other NP in the same finite clause.⁸ The highest NP, i.e. the subject, will always get nominative. If we do something to the argument structure of a clause to add or subtract an argument at the top, this can then affect the case of an NP below it.

Things get trickier when a simple clause has more than two arguments. By far the most common pattern in the Gmc languages is that we still have one nominative and one accusative, with the addition of a dative. However, it is not clear whether the assignment of this dative should be regarded as a structural case. First, while it's usually fairly clear in transitive clauses which of the two arguments is structurally higher, and this relative height matches reliably with the assignment of nominative and accusative, things are often more difficult with ditransitives. Even where we do have good arguments regarding the hierarchy of the arguments, we *don't* find a consistent relationship with the cases they are assigned. In German, for example, even though most ditransitive verbs involve a nominative subject above a dative object, which is in turn above an accusative object, there is also a class (including verbs like *aussetzen* 'expose') where the accusative object is higher than the dative one (Wegener 1991; Haider 1993; Meinunger 2000; McFadden 2004; Cook 2006; McIntyre 2006), and similar patterns have been reported for Icelandic (see Thráinsson, 2007, section 4.1.2.3, with references). Case assignment in such ditransitives thus cannot be determined purely on the basis of structural hierarchy, but must make reference to other information. One option is that case assignment in such instances is simply regulated by lexical information. I.e. it would be part of the lexical specification of *aussetzen* that it assigns accusative to its higher object and dative to its lower one, while *geben* 'give' would be specified to assign case the other way around. A more interesting possibility is that case assignment in these instances is guided by semantic or thematic factors. Indeed, there are clear — if tendential — generalizations about the semantics of the arguments that will be realized as high versus low datives (see the sources cited above).

An important question then is how we should understand the assignment of these various datives theoretically. One widespread idea is that they should have a status distinct from the structural cases nominative and accusative, which are assigned on purely syntactic grounds, independent of semantic and lexical concerns. The dative, on the other hand, is regarded as an **inherent case**. It is assigned to specific arguments of specific (classes of) verbs, in a way that is independent of the presence or absence of other arguments in the same argument structure. This accounts for the fact that such inherent cases are generally unaffected by argument structure alternations like passivization, as shown by the German examples in (11):

⁸This is essentially the import of Burzio's Generalization (Burzio, 1986), which has been incorporated into several diverse approaches to case assignment. See the contributions in Reuland (2000) for discussion.

- (11) a. Die Chefin glaubte mir den Bericht nicht.
 the boss-FEM.NOM believed me.DAT the report.ACC not
 'The boss didn't believe my report.'
- b. Die Chefin glaubte mir nicht.
 the boss-FEM.NOM believed me.DAT not
 'The boss didn't believe me.'
- c. Mir wurde der Bericht nicht geglaubt.
 me.DAT was the report.NOM not believed
 'My story wasn't believed.'
- d. Mir wurde nicht geglaubt.
 me.DAT was not believed
 'I wasn't believed.'

(11a) shows a ditransitive with a nominative subject, dative indirect object and accusative direct object. The verb *glauben* 'believe' has the useful property that its accusative object can be left off, but the indirect object remains and is crucially still assigned dative, as in (11b). If the assignment of the dative were e.g. dependent on the presence of a lower accusative argument, we would expect it to change to an accusative in this context, but it does not. We learn something else interesting if we passivize clauses with *glauben*, as in (11c) and (11d). Again, the dative remains dative, even though the nominative subject above it has been removed — in stark contrast to the structural accusative which, as we saw in (10) above, changes to nominative in such contexts. Indeed, an argument does become nominative in (11c) as well, but it is the accusative lowest object *den Bericht* 'the report' from (11a). All of this suggests that the dative is independent of and irrelevant to the assignment of nominative and accusative. This is further reinforced by (11d), where we leave off the lowest accusative object *and* passivize, getting rid of the highest nominative argument, leaving just the dative argument, which remains dative. Additionally relevant here is the fact that there are a number of verbs in German, Icelandic and the various older Germanic languages which are not ditransitive and yet assign dative to an argument. Well-known examples in German include *folgen* 'follow', *gehören* 'belong to' and *helfen* 'help', shown in (12a). Such structures make it especially clear that the dative is independent of any additional accusative object, and here too, passivization has no effect on the dative, as in (12b).

- (12) a. Die Chefin hat mir geholfen.
 the boss-FEM.NOM has me.DAT helped
 'The boss helped me.'
- b. Mir ist geholfen worden.
 me.DAT is helped been
 'I was helped.'

The broadly agreed-upon theoretical understanding of facts like these is that the structural and inherent cases are assigned in distinct ways that render them independent of each other to a considerable extent, and furthermore that in instances where

the conditions for either a structural or an inherent case would be met, it is the inherent that takes precedence. The basic idea, again abstracting away from many important theoretical differences, is that any inherent cases are assigned to the various NPs first, based on their thematic relationships with particular predicates. Because they come first, they supercede any structural cases, and because they are determined by thematic relationships with predicates, they are not sensitive to other syntactic factors, including the presence or absence of other arguments, and thus will be unaffected by things like passivization. Then the rules for structural case get to apply, based on the syntactic positions and relationships with relevant functional heads of any arguments that have not received an inherent case. Due to their sensitivity to such structural relationships, the structural cases *can* be affected by things like passivization. There are several ideas about how the structural and inherent cases are kept orthogonal from each other. The Case in Tiers approach (Yip et al., 1987, etc.) pursues the idea, inspired by autosegmental phonology and morphology, that they operate on distinct representational tiers, much like consonants and vowels in accounts of Semitic templatic morphology. Work in GB (e.g. Chomsky, 1981; Haider, 1985) associated inherent case (however indirectly) with θ -role assignment, and thus with lexical heads and D-structure, whereas structural case was independent of θ -roles and could be assigned at or on the way to S-structure. Some work in the Dependent Case theory tradition initiated by Marantz (1991) explores the possibility that inherent case creates a kind of structural opacity, making an NP it is assigned to invisible for the subsequent computation of structural case Richards (2010); Baker (2015); McFadden (2014).

An important question is the extent to which inherent case is predictable, e.g. based on semantic or thematic roles. The dative assigned to traditional indirect objects, in particular, shows clear and consistent semantic correlations, is mostly predictable and is typically productive.⁹ Simplifying a bit, if a verb takes two objects, one a theme or patient and the other a beneficiary, recipient or goal, the latter will quite reliably receive dative (and the former accusative) in all Gmc languages with a solid dative-accusative distinction. Moreover, there are clear generalizations that can be made about the when the sole object of a verb receives dative rather than the expected accusative. Such datives are commonly beneficiaries (*helfen* ‘help’ and cognates), experiencers (*gefallen* ‘please’) or locations/goals (*folgen* ‘follow’ or *begegnen* ‘run into’). Nonetheless, the correlations between cases and semantic or thematic roles are notoriously approximate. It is not even particularly difficult to find pairs of verbs with fairly close semantics but rather different case frames, e.g. German *unterstützen* ‘support’ takes an accusative object in contrast to the dative-assigning *helfen* ‘help’.¹⁰ These facts have always been taken to show that the relationship between cases and semantic/thematic roles cannot be direct. Indeed, the traditional GB view was that inherent case was associated with θ -roles in that an NP could only be assigned inherent case by the lexical item that assigned its θ -role, but it was *not* thought that specific cases were tied to specific θ -roles (see Haider, 1985 for explicit and representative discussion of this issue). The quite traditional idea, then, is that inherent case — unlike the semantic case we discussed above — is not tied directly to an NP’s semantics, but is assigned by the lexi-

⁹The discussion to follow could also be applied to inherent genitives and accusatives, but the patterns there are far less consistent and well understood, so I will leave them aside here.

¹⁰See Sigurðsson (2009, p. 270) for a list of similar pairs from Icelandic.

cal verb. We can state generalizations about the kinds of verbs that take dative objects, but in the end it is a fact about the verb *helfen* that it assigns dative to its beneficiary argument whereas *unterstützen* does not.

Once we think in these terms, an interesting analytic possibility arises. If we have recourse to lexically specific statements, we can use these to take care of true exceptions, allowing us to be bolder about building the general patterns into the theory. We can propose that there actually are real and direct connections between particular θ -roles and particular cases, e.g. that recipient arguments are, by default, assigned dative case. It just happens that specific lexical verbs can be specified with exceptional patterns that supercede the general thematic patterns. It is thus frequently suggested that in addition to structural and inherent case, we should recognize **lexical case** as a distinct type. [Woolford \(2006\)](#), who explores these issues in depth, puts things rather nicely:

“It has often been noted that some instances of nonstructural Case are truly idiosyncratic, while others are quite regular and predictable ... There is general agreement that the truly idiosyncratic Cases ... are lexically selected by individual verbs; it is thus appropriate to label these as instances of lexical Case. Other instances of nonstructural Case ... are much more regular and predictable, and fit the notion of inherent Case as Case that is inherently associated with θ -marking” [p. 112].

This could then mean that the divide between the structural cases and the more regular and predictable inherent ones is not so sharp as was thought. Indeed, a number of researchers have argued that at least some datives in Gmc should be analyzed as structural in some sense (see [Wegener, 1991](#) for insightful discussion and foundational empirical findings from German).

Broadly speaking, we can distinguish two different ‘structural’ approaches to Gmc datives. The first is exemplified especially by work in Lexical Decomposition Grammar ([Wunderlich, 1997](#); [Stiebels, 2002](#), etc.), in which the contexts for assignment of the different cases are expressed using features that make reference to the presence of additional higher or lower arguments in an argument structure hierarchy. The accusative is [+hr] (“there is a higher role”), while the nominative is simply underspecified. The dative is then specified as [+hr, +lr], meaning that it is assigned to an argument position that has additional arguments both above and below in the structure.¹¹ This characterizes the highly regular and predictable dative found with ditransitives. What about the various types of monotransitive verbs with dative arguments? With *helfen*, e.g., the object should be [+hr] because of the higher subject, but should lack [+lr] since there is no lower argument, and thus we incorrectly expect an accusative. Again, this can be addressed by additional lexical specifications. [Wunderlich \(1997\)](#) proposes that, on top of the values for [+hr/+lr] supplied to arguments based on their place in the argument structure, lexical verbs can specify additional features for particular θ -roles. Thus *helfen* has a lexical [+lr] on its lower θ -role, which combines with the [+hr] based on position, yielding an argument that will be linked as a dative. Another concern

¹¹[Baker \(2015\)](#) proposes a somewhat similar view of certain kinds of datives within the framework of Dependent Case theory, but it is not clear that he would extend this to any of the Gmc languages.

for this approach is why datives don't seem to undergo alternations with other cases the way that accusatives become nominative under passivization. It has been pointed out, however, that datives in German *do* seem to undergo alternations in other circumstances. Most famously, while the dative remains fixed in the standard passive, a distinct 'recipient passive' can be constructed (at least in colloquial varieties) with ditransitives using *kriegen* 'get' or *bekommen* 'receive' as the auxiliary (see [Wegener, 1991](#); [Abraham, 1995](#); [Cook, 2006](#) and many others), as shown by the alternation in (13).

- (13) a. Die Chefin schickt mir den Bericht per Post.
 the boss-FEM.NOM sends me.DAT the report.ACC by post
 'The boss will send me the report by (snail) mail.'
- b. Ich kriege/bekomme den Bericht per Post geschickt.
 I get/receive the report by post sent
 'I'll be sent the report by (snail) mail.'

There has also been extensive discussion of dative alternating with nominative in Icelandic under certain circumstances. While Icelandic datives are generally retained in the passive, the dative assigned to direct objects of certain monotonatives alternates with the nominative in what is sometimes termed the middle or anticausative, which is formed with an *-st* suffix ([Svenonius, 2006](#); [Sigurðsson, 2009](#), etc.), exemplified in (14) from [Wood \(2015\)](#):

- (14) a. Ásta splundraði rúðunni.
 Ásta.NOM shattered window.the.DAT
 'Ásta shattered the window.'
- b. Rúðunni var splundrað.
 window.the.DAT was shattered
 'The window was shattered.'
- c. Rúðan splundraðist.
 window.the.NOM shattered-ST
 'The window shattered.'

Icelandic also has a 'get'-passive that shows a dative-to-nominative alternation similar to the German recipient passive ([Sigurðsson and Wood, 2013](#)). Such alternations can be taken as evidence that the relevant datives are not assigned purely based on a thematic relationship to a particular verb as traditionally assumed under. That relationship is presumably unmodified in the recipient passives or the Icelandic anticausative, and so we would expect the dative to be preserved. Rather, the dative seems to be assigned based on the structural status of the argument, which is related to the thematic properties of the relevant verb but can be modified by the right type of argument-structural operation. However, it has also been argued that the alternations here do not have the same status as those between accusative and nominative. [Sigurðsson and Wood \(2013\)](#) e.g. propose that in the Icelandic 'get'-passive, the nominative does not actually correspond to the dative verbal argument in transitive and normal passive constructions, but rather is introduced as an argument of 'get' itself. Thus what we see would not constitute evidence that the dative is a structural case like the accusative.

The second broad approach to the dative as a ‘structural’ case is a bit more of compromise. Like the traditional inherent case approach, it recognizes that even these datives are assigned differently than structural accusatives, accounting for their restricted ability to alternate. But like the approach just described, it also recognizes that many datives are regular and predictable based on argument-structural and thematic considerations, and thus posits a means of assignment that is more anchored in the abstract syntax than in lexical peculiarities of specific verbs. Approaches in this vein typically rely on the more nuanced structural analyses of the traditional verb phrase in recent work, with additional functional heads responsible for various aspects of argument structure and thematic detail. The most popular proposal is that recipient and beneficiary arguments are introduced not by the lexical verb itself, but by a special Applicative functional head, following [Marantz \(1993\)](#); [Pylkkänen \(2002\)](#). Note how can accommodate the intermediate status of predictable datives. Dative can be assigned to the DP in Spec-AppIP in a way that essentially follows traditional ideas about inherent case: it is purely on the basis of the thematic or first-merge relationship of the DP to the relevant syntactic head, does not depend on any other properties of the clause, and thus will take precedence over the structural cases and be unaffected by things like passivization. However, the fact that it comes from the Appl head and not from the lexical verb accounts for the thematic predictability and productivity. Typical datives are *not* assigned by specific lexical verbs with their various idiosyncracies, but by a functional head with a consistent syntactic and semantic contribution. Properties of the lexical verb only come in for the compatibility of various verbs with the Applicative structure. Cross-linguistic differences in the availability of certain kinds of datives can then be attributed to parametric differences in both the availability of specific Applicative and other argument-introducing heads, and in which of these are specified to assign dative to their arguments. See e.g. [McFadden \(2004, 2006\)](#); [McIntyre \(2006\)](#); [Schäfer \(2008\)](#); [Sigurðsson \(2009\)](#); [Wood \(2015\)](#) for applications of this type of analysis to datives in Germanic.

Against this background, we can now say a bit more about how specific Gmc languages differ in the particulars. For space reasons I will go into very little detail here, restricting myself to pointing out broad patterns of distinction and referring the reader to the vast existing literature for details. What we know about Gothic is relatively limited. This is largely because of the limited size of the corpus of surviving Gothic texts and the fact that they are essentially all translations, meaning that it is not always clear what reflects actual native Gothic grammar as opposed to the Greek original.¹² For basic description of the use of the cases in OHG, see [Schrodt \(2004\)](#). The situation is considerably better for OE. [van Kemenade \(1987\)](#) and especially [Allen \(1995\)](#) provide useful overviews, including discussion of whether particular uses of particular cases should be regarded as structural or inherent as well diachronic developments.

For Icelandic, both Old and Modern, a considerable volume of high quality work is available. [Thráinsson \(2007\)](#) provides systematic coverage of the case patterns in the context of a general description of the syntax of the language. [Barðdal \(2001\)](#); [Barðdal \(2009\)](#) gives extensive discussion of the use of the different cases in both Old and Modern Icelandic, with useful discussion of the observed changes. Halldór Ármann

¹²See e.g. the discussion of the absolutive construction ([Dewey and Syed, 2009](#), with references), the topic that has received the most attention when it comes to the distribution of cases in Gothic.

Sigurðsson's work (Sigurðsson, 1989, 2006, 2009, etc.) contains a wealth of insightful observations and discussion on the distribution of the cases and how these interact with various important syntactic details. Maling (2001, 2002) catalogues the syntactic, thematic and lexical patterns in the use of the dative in particular. Some notable peculiarities of Icelandic case distribution include: the dative of objects of ballistic motion (Svenonius, 2002; Jónsson, 2012); the so-called 'new passive' or 'new impersonal' construction, where accusative is unexpectedly retained on objects after demotion of the subject Maling and Sigurjónsdóttir (2002); so-called 'fate accusatives', which appear unexpectedly on the sole arguments of unaccusatives under certain circumstances (Sigurðsson, 1989, 2006; Schäfer, 2008; Wood, 2017); the retention of an especially large number of verbs with one or more inherent case-marked arguments (see especially Barðdal, 2009 for comparison with other Gmc languages as well as (Yip et al., 1987; Sigurðsson, 1989; Maling, 2002; Jónsson, 2003) among many others); the evidence (from agreeing secondary predicates) that null even DPs including PRO subjects of non-finite clauses are assigned case (Sigurðsson, 1991 and much following work).

Careful discussion of case distribution in German can be found e.g. in (Haider, 1985, 1993; Czepluch, 1996; Maling, 2001; Haider, 2010) and several contributions in Hole et al. (2006). Some points of interest include the fact that the overt expletive *es* in certain contexts is sufficiently argumental to license accusative on a lower argument, e.g. in the expression *es gibt...* 'there is', and in constructions that are vaguely akin to Icelandic fate accusatives Haider (2000); Schäfer (2008); there is also evidence for assignment of case to silent PRO, but it is far more restricted than in Icelandic (Haider, 2010, p. 293ff.); a moderate number of verbs still assign inherent case to one of their arguments, but far fewer than in Icelandic, with a far more restricted set of patterns retained — inherent accusative is restricted to a handful of verbs, and inherent genitive is almost entirely gone (Haider, 1985; Yip et al., 1987; Maling, 2001; McFadden, 2004; Barðdal, 2009). Note that this latter point is part of a broader historical tendency across Gmc of the gradual decrease in the frequency and variety of inherent and lexical case patterns, which correlates only approximately with the general reduction in case distinctions in a language. See especially Barðdal (2009) and Eyþórsson et al. (2013) for comparative discussion and Allen (1995) on diachronic patterns in English, in particular the surprising longevity of oblique subject constructions well after the loss of the dative-accusative distinction in the language.

One further point of variation in Gmc that is relevant to the preceding theoretical discussion is what structural case will appear on the lower argument of a monotransitive verb when the higher argument receives an inherent case. In German and Icelandic, it is uniformly nominative, as in the German example in (15a), which supports the idea that inherent case-marked NPs are invisible for the calculation of structural cases. Famously, however, in Faroese they receive structural accusative, as in (15b):

- (15) a. Mir gefällt dieser Song.
 me.DAT please this song.NOM
 'I like this song.'
- b. Mær dámar væl hasa bókina.
 me.DAT like well this book.ACC
 'I like this book.'

Barðdal (2009) reports analogous patterns for stages of ME and Old Swedish, so this is clearly something available as a general option. In such languages, things must be set up so that inherent case-marked NPs are visible after all for the assignment of structural accusative.

Things brings us finally to the general distribution of cases in the Gmc languages which retain only the two-way distinction between nominative and general oblique. We can distinguish here two broad groups (Sigurðsson, 2006). In the first, including Swedish, Dutch, Afrikaans and some varieties of Norwegian, the use of the two cases resembles fairly closely what is observed in the languages with richer case systems, except that the undifferentiated oblique takes over roles played elsewhere by both accusative and dative. In particular, pronouns are in their nominative form when used predicatively and in various types of fragmentary or elliptical contexts when the corresponding pronoun in a non-fragmentary version would have been nominative, as seen in the Swedish examples in (16).

- (16) a. Det är vi
it is we.NOM
'It is us.'
- b. Vem gjorde detta? Jag.
who did this? I.NOM
'Who did this? Me.'

For these languages, it seems to plausible to adopt essentially a simplified version of the analysis used for German and Icelandic, with a reduced inventory and no need for inherent or lexical case. The second group, which includes at least English, Danish and other varieties of Norwegian, looks like the first group as long as we look at simple subject and object pronouns in full clausal environments. However, pronouns are oblique when used predicatively or in fragmentary contexts, irrespective of what shape they would have taken in the non-fragmentary analogues:

- (17) a. It's us/*we.
b. Who did this? Me/*I.

Similarly, unlike in the case-rich Gmc languages and the first group of case-poor ones, we find oblique forms of pronouns in these languages when they are conjoined, modified, left-dislocated or appear as complements of comparatives (see e.g. Schütze, 2001; Quinn, 2005; Parrott, 2007, 2009 for data and discussion).¹³

This has led to rather different accounts of case assignment in these languages. A central insight developed by Schütze (2001), building on ideas from Marantz (1991) is that the two groups of languages differ in terms of which case functions as the default. In the first group, as in the case-rich languages, nominative is the default case, while oblique has to be explicitly assigned where certain conditions are met. In the second

¹³The relevant facts in both English and Danish are subject to heavy inter- and intra-speaker variation, conditioned by strong prescriptivist pressure towards something a bit more like the Swedish system. For details and discussion I refer the reader to the excellent work by Quinn (2005); Parrott (2007, 2009) and further sources cited there.

group, this relationship is reversed: oblique is the default case, and nominative is assigned by special rule. The odd and limited distribution of the nominative forms in these languages comes out of the fact that this rule is highly specific, apparently making reference to a tight relationship with the finite subject position. Schütze (2001) retained at least the outlines of a nominative-accusative system behind the scenes in these languages, but subsequent researchers have pursued the idea that they have actually moved to a different type of system. McFadden (2004); McFadden and Sundaresan (2011) argue that while all nominatives in languages like German and Icelandic are default case, all obliques in English are default case as well. That is, there is no structural oblique in the second group of case-poor languages anymore, and since the ‘nominative’ is assigned according to rather different principles than those observed elsewhere, vestigial case languages like English and Danish should no longer be classified as nominative-accusative in typological terms. Parrott (2007, 2009) goes one step further, arguing that in fact the alternations that we see in such languages no longer reflects case features at all. Rather, the alternations in pronominal forms should be analyzed as instances of contextual allomorphy. This explains why the distribution of the forms no longer conforms to what is expected for nominative-accusative languages as well as a series of quite peculiar restrictions on the distribution of the forms that make reference to things like linear order and adjacency.

4 Interactions

In this final section I turn to a selection of topics where case interacts with other grammatical issues and the Gmc languages have played an important role in related theoretical debates. The discussion will work through three broad, interconnected themes. I will start by taking up in more detail the relationship between case and grammatical functions and in particular the discussion of so-called **quirky case**. This will naturally lead into a consideration of the notion of **abstract Case**, and in particular how morphological case may — or may not — relate to conditions on the licensing of NPs in different syntactic positions. Resulting questions about how syntax and morphology interact will bring us to a discussion of how richness of morphological case in a language correlates with other syntactic properties.

In the preceding section I repeatedly made informal reference to grammatical functions like subject and object. Note however that in my more careful formulations, I spoke in terms of thematically or syntactically higher and lower arguments. There are two reasons for this. First, most syntactic work in Chomskyan varieties of the Generative tradition does not admit grammatical functions as theoretical primitives. Subject and object are at most derivative notions, defined in terms of structural positions, and used as descriptive labels for convenience rather than components playing a crucial role in the formulation of analyses. Thus e.g. in early Minimalist terms a DP would get nominative not by virtue of being the subject, but because it occupies Spec-TP, finite T bears a nominative feature, and case is assigned via Spec-head agreement. Second, as a matter of fact, it is rather difficult to develop operationalizable characterizations of the grammatical functions that work well across languages — even just the Gmc languages — and even when we think we can e.g. get a grip on subjects in a particular

language, the relationship between grammatical functions and cases rarely turns out to be one-to-one. The working out of these issues took place in large part on the basis of Gmc languages and in particular the phenomenon of quirky case.

The assumption from traditional grammar was that subjects are assigned nominative case and trigger agreement on the finite verb. Thus by and large if an argument was nominative, it could be regarded as the subject, and if it had some other case, it would have to be some sort of object. Certain constructions, found in Gmc but also many other language, have always presented a challenge for these assumptions, because the case marking we see is out of whack with our expectations about what it is to be a subject. The German example in (18) is typical:

- (18) Mir gefallen deine neuesten Aufsätze.
me.DAT please.3PL your newest papers.PL.NOM
'I like your most recent papers.'

The verb *gefallen* 'please' or 'like' takes a dative experiencer argument and a nominative theme. The nominative also triggers person and number agreement on the verb. We would thus be apt to take the theme as the subject here, and the experiencer as the object. Now, if we define subject and object purely in terms of case, and have no further expectations about their properties, then grammatical functions will be of no real use, entirely redundant with the cases they receive. For them to be worthwhile theoretical notions, they must be predictive of other properties or behaviors, e.g. along the lines proposed in works like Keenan (1976). It turns out then that if we develop such independent criteria for identifying subjects and objects and then look to see how these match up with the cases that DPs receive, we get a surprise. The remarkably clear result, at least for Icelandic, is that case and subjecthood are orthogonal to each other (Andrews, 1976; Thráinsson, 1979; Andrews, 1982; Zaenen et al., 1985, and much subsequent work). If we take an Icelandic example like (19) from Zaenen et al. (1985), roughly parallel to German (18), a series of diagnostics show that the dative argument *henni* 'her' behaves like the subject, while the nominative *Ólafur* is the object.

- (19) Henni hefur alltaf þótt Ólafur leiðinlegur.
her.DAT has always thought Olaf.NOM boring.NOM
'She has always thought Olaf boring.'

This dative — but not this nominative — undergoes raising, can bind a reflexive, appears immediately after the finite verb in a verb-second clause when another constituent is fronted, can appear in initial position in non-V2 embedded clauses, can be elided in certain conjunct structures and can be null PRO in control infinitives. In all of these respects, the dative behaves like the uncontroversial subjects and *unlike* the uncontroversial objects of prototypical, highly transitive clauses. All of this means that the notion of subject must be independent of case, at least in Icelandic.

It has usually been thought, however, that this is a point of difference with German. The same set of tests applied in the latter language to examples like (18) do *not* clearly indicate that the dative argument should be analyzed as the subject and the nominative as the object (Zaenen et al., 1985, and following). In fact, the classical treatment is that inherent cases like the dative in (18) actually *prevent* an NP from becoming the

subject. Under this view, the fact that such datives could be subjects in Icelandic presented a challenge, which engendered a series of interesting debates centered around comparative Gmc data, ultimately leading to proposals that radically altered how case is understood within syntactic theory.

To understand this discussion, we need to step back and consider the theory of abstract Case that constituted a central module of GB theory. Following a suggestion made by Jean-Roger Vergnaud (Vergnaud, 1977), Chomsky (1980, 1981) proposed that Case — as an abstract syntactic notion, with distinctive capitalization — is universal and plays a central role in driving and constraining syntactic derivations, though languages may differ in whether and how it may translate into overt morphological realization (see Lasnik, 2008, for a detailed history of relevant ideas). The central assumption that gets the system off the ground is the Case Filter, which states that an NP is only licensed to appear overtly if it has received abstract Case. If an NP starts out in a position where it cannot receive Case, then either it must move to a position where it *can*, or it must remain silent (perhaps requiring further licensing), or the result will not be a well-formed sentence. Case Theory in this form provided a unified approach to a series of disparate facts about the overt distribution of NPs, including conditions on A-movement and the behavior of different types of infinitival clauses. The fundamentals were developed on the basis of English, which again shows little overt morphology, but with the idea that it should be applicable as well to case-rich languages where the different cases would be more easily identifiable on the surface. Indeed, at least in outlines, the patterns observed in languages like German seemed to confirm this. One central aspect of classical Case theory is that movement of NPs to a derived subject position like Spec-TP is driven by their need for Case. Given that inherent Cases are determined upon the thematic position of an NP and are unaffected by A-movement and passivization, we make a straightforward prediction. If we passivize a normal transitive verb, structural accusative on its object will disappear, and the object will be forced to move to subject position to receive nominative Case. If, however, we have a verb that assigns inherent dative to its object, then passivization will leave the dative Case unaffected, and the object will not be driven to move to subject position for nominative Case. This fits in nicely then with the evidence that datives and other inherent case-marked NPs do not behave like subjects in German, even under passivization.

But now we see why Icelandic presents a problem. Arguments that receive dative or any other inherent Case from the verb should not have to move to Spec-TP for Case, and thus should not behave like subjects. Initially, attempts were made to minimize the import of the Icelandic patterns by emphasizing the idea that abstract Case has an indirect relationship with overt morphological case and regarding the degree of that indirectness as a quirk of Icelandic. The standard analysis was that oblique subjects in Icelandic actually get structural nominative abstract Case, but then get a quirky morphological dative (or accusative or genitive) case on top of this (Freidin and Sprouse, 1991; Chomsky, 2000, see e.g.). German, on the other hand, is more transparently well behaved, in that the morphological case matches up with the abstract inherent Case. This view has subsequently come under intense fire. For one thing, it has been put forward that the contrast between Icelandic and German has been overstated or misinterpreted. Barðdal (2002); Barðdal and Eythórsson (2003) e.g. argue that, contrary

to prior claims, the relevant German datives *do* behave as subjects. [McFadden \(2004, 2006\)](#) suggests that the difference between the two languages is not the status of the dative arguments themselves but in the existence of a clear syntactic subject position that plays an important role in clausal syntax and thus can be easily tested for. The crucial point for this work is that most of the subjecthood diagnostics for Icelandic are simply not applicable in German, i.e. they don't single out nominative subjects either. Subsequent research has furthermore identified quirky case-marked subjects in a number of languages around the world (see e.g. the contributions in [Bhaskararao and Subbarao, 2004](#)). It is thus not viable to treat the mismatch between grammatical functions and syntactic positions on the one hand, and morphological cases on the other, as a quirky phenomenon restricted to a few languages like Icelandic. It may still be useful to adopt some version of abstract Case theory to model the syntactic distribution of overt DPs, but it has become increasingly clear that the distribution of specific morphological cases in languages that have them will be at best indirectly related to this. Thus we might wonder whether Case is really an appropriate label for whatever licensing requirement drives DP distribution (see e.g. [McFadden, 2004](#); [Sigurðsson, 2009](#)). This has led to a divide in theoretical treatments of case. Those who are primarily interested in the syntactic distribution of DPs typically maintain updated versions of abstract Case theory (typically following [Chomsky, 2001](#)), where specific (abstract) Cases are assigned via Agree with specific functional heads. Those who are concerned with the distribution of actual morphological cases, on the other hand, tend to adopt theories with a pedigree going back to [Yip et al. \(1987\)](#); [Marantz \(1991\)](#); [Kiparsky \(1992, 2001\)](#) based on the insight that at least the structural cases are assigned in a way that depends on how a DP relates to other DPs in a local domain, not specific positions or functional heads.¹⁴ This includes work in the Case in Tiers framework ([Yip et al., 1987](#)), under the linking theory of Lexical Decomposition Grammar ([Wunderlich, 1997](#); [Stiebels, 2002](#)), and more recently especially [Marantz \(1991\)](#)'s Dependent Case approach ([McFadden, 2004](#); [Sigurðsson, 2006](#); [McFadden, 2009](#); [Baker and Vinokurova, 2010](#); [Baker, 2015](#); [Levin and Preminger, 2015](#); [Levin, 2017](#); [Baker and Bobaljik, to appear](#)).

The final topic for this chapter pertains to how morphological case relates to the syntax from a concrete and comparative perspective. Abstract Case theory posits certain universal points of contact between Case and syntactic derivations, but as we have discussed extensively in our consideration of morphological case in Gmc, specific languages differ considerably in the cases they distinguish and how they are concretely realized. We might reasonably ask then whether and how such differences in morphological case correlate with differences in the syntactic properties of the languages, and by extension whether there are causal connections between the loss of case distinctions we've discussed in the languages and any observable syntactic changes.

We can start with the traditional observation that languages with rich case marking, e.g. Latin, tend to allow greater word-order freedom than case-poor ones, e.g. English. There have been a number of attempts to derive such observations from deep theoretical principles, often based on data from Gmc languages. For example, [Neeleman and Weerman \(1999\)](#), building on [Lamontagne and Travis \(1987\)](#), propose that

¹⁴Indeed, a commonly repeated witticism in recent years (originating, as far as I know, with Mark Baker) is that 'Standard Case Theory' is primarily assumed by people who don't work on case.

abstract Case requires close syntactic proximity between a DP and its Case-assigner, and thus relatively rigid ordering, unless the Case is overtly realized. They use this to account for why case-poor modern Dutch has more restricted positioning of objects than either modern German or older stages of Dutch that still had a richer case system. [Kiparsky \(1997\)](#) proposes that a DP can be associated with a θ -role either via morphological case, or due to canonical ordering relative to the verb. While both options are available to a language with rich case marking, a case-poor language is forced to rely on canonical ordering. This can explain why case-poor modern English requires IO-DO order in double object constructions, while German, which distinguishes dative from accusative, allows both IO-DO and DO-IO. Fittingly, OE was like German in this respect, and the loss of DO-IO orders in ME coincides at least approximately with the collapse of the dative-accusative distinction ([McFadden, 2002](#)).

It has also been argued that richness of case morphology correlates not just with freedom of word order but with the availability of specific orders. One common observation is that, while Icelandic and the mainland Scandinavian languages have broadly similar syntax in many respects, they differ in the availability of object shift. Object shift is (mostly) obligatory with pronouns in all of Scandinavian, but it is possible with non-pronominal objects only in Icelandic. [Holmberg and Platzack \(1995\)](#) tie this difference directly to the fact that Icelandic distinguishes morphological case in both pronouns and non-pronominal NPs, while the mainland Scandinavian languages have vestiges of case only in their pronouns. [Roberts \(1997\)](#) proposes an extension of this idea to account for a change in English, from the largely OV OE to the rigidly VO modern language. He observes that crucial stages of this change occurred during ME, around when the case system collapsed. He then adopts [Kayne \(1994\)](#)'s antisymmetry approach to surface OV orders as derived by movement, specifically object shift driven by the need for Case (following [Chomsky, 1995](#)). He then develops an account where rich case-marking forces object shift to be overt, yielding OV order in OE, while the lack thereof allows it to default to being covert, yielding VO from ME onwards.

As we can see, there was a move to tie particular syntactic properties to the presence of morphological case through the 1990s and early 2000s. This was part of a larger trend of seeing syntactic operations as morphologically driven (see also the tradition of work connecting verb movement to richness of tense and agreement inflection inspired by [Pollock, 1989](#)), and it motivated a good deal of interesting and productive comparative work. However, subsequent research has cast doubt on such direct relationships, with comparative Gmc data again playing an important role. While the correlation between rich case marking and word-order freedom is fairly clear, it turns out to be only tendential. Even restricting ourselves to modern Gmc languages, Icelandic has the richest system of case marking, but has considerably more rigid word order than German. Even Dutch, one of the vestigial case languages, allows certain freedoms lacking in Icelandic, e.g. with scrambling ([McFadden, 2004, 2005](#)). Turning to object shift, a large-scale study by [Sundquist \(2002\)](#) shows that diachronic developments of OS in mainland Scandinavian do not track with changes in their case systems as they should if the two were tightly connected in the grammar. As for the connection between OV order and case marking, Icelandic and Dutch present immediate and obvious problems — the former has rich case marking yet is VO, while the latter has lost case and yet is OV. Approaches like [Roberts \(1997\)](#) can deal with such mismatches,

but only by resorting to mechanisms that significantly weaken their predictive power. Diachronic work by [Hróarsdóttir \(2000\)](#) and [Sundquist \(2002\)](#) on Scandinavian and by [Pintzuk \(2002\)](#) and [McFadden \(2005\)](#) on English has also shown that the timing of changes does not match up as tightly as it should if word order were directly tied to the richness of case morphology. Finally, as discussed by [McFadden \(2004, 2005\)](#) for case and [Alexiadou and Fanselow \(2000\)](#); [Bobaljik \(2002\)](#) for verbal inflection, there are considerable methodological and theoretical problems, both with the concept of ‘rich inflection’ and with the idea that it could directly drive syntactic computation. All of these authors come to the conclusion that what drives the observed correlations must related to how language acquisition and change are sensitive to inflectional distinctions, rather than dependencies within the grammar.

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